

Margaret A. McLetchie (NV Bar No. 10931)
Email: maggie@nvlitigation.com
Leo S. Wolpert (NV Bar No. 12658)
Email: leo@nvlitigation.com
McLetchie Law
602 S. 10th St.
Las Vegas, NV 89101
Telephone: 702-728-5300
Local Counsel for Defendant AJP Educational Foundation, Inc.

Christina A. Jump (*admitted pro hac vice*)
Email: cjump@clcma.org
Samira S. Elhosary (*admitted pro hac vice*)
Email: selhosary@clcma.org
Constitutional Law Center for Muslims in America*
100 N. Central Expy, STE 1010
Richardson, Texas 75080
Telephone: 972-915-2507
Attorneys for Defendant AJP Educational Foundation, Inc.

**The Constitutional Law Center for Muslims in America
is the legal division of the Muslim Legal Fund of America.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

COREY GERWASKI,

Plaintiff,

v.

STATE OF NEVADA, ex rel. BOARD
OF REGENTS of the NEVADA
SYSTEM OF HIGHER EDUCATION,
on behalf of the UNIVERSITY OF
NEVADA, LAS VEGAS; CHRISTOPHER
HEAVEY, in his official capacity as current UNLV
Interim President; AJP
EDUCATIONAL FOUNDATION INC.,
a California Non-Profit Corporation;
STUDENTS FOR JUSTICE OF
PALESTINE-UNLV; NATIONAL
STUDENTS FOR JUSTICE OF
PALESTINE; NEVADANS FOR
PALESTINIAN LIBERATION;
DOES I-XX and ROE entities I-XX,

Defendants.

Case No. 2:24-cv-00985-APG-MDC

**STIPULATION TO EXTEND DEADLINE TO
FILE RESPONSIVE PLEADING**

(First Request)

1 It is hereby stipulated between undersigned counsel for Plaintiff and counsel for Defendant AJP
 2 Educational Foundation, Inc., counsel for Defendant Students for Justice in Palestine – UNLV, and
 3 counsel for Defendants Board of Regents of the Nevada System of Higher Education on behalf of the
 4 University of Nevada, Las Vegas and Christopher Heavey that the date for Defendants’ responses to
 5 Plaintiff’s Second Amended Complaint shall be extended. Plaintiff filed his Second Amended Complaint
 6 (ECF No. 79) on **June 3, 2025**. Thus, pursuant to FRCP 15(a)(3), Defendants’ responses are currently
 7 due on **June 17, 2025**. The parties stipulate to extend this deadline by 38 days, to **July 25, 2025**. This is
 8 the first request for an extension of the instant deadline.

9 Good cause exists to extend this deadline. Defendants AJP Educational Foundation, Inc. and
 10 Students for Justice in Palestine – UNLV intend to serve Motions for Sanctions Pursuant to FRCP 11(c)
 11 upon Plaintiff, on the grounds that his Second Amended Complaint violates FRCP 11(b). The current
 12 deadline would not allow adequate time for Defendants to draft and serve a FRCP 11(c) sanctions motion
 13 or allow adequate time for Plaintiff to appropriately correct the Second Amended Complaint and the
 14 claims therein—if he so desires—under the safe-harbor provision of FRCP 11(c)(2). Permitting the
 15 parties to engage in Rule 11 motion practice before a responsive pleading is filed promotes judicial
 16 efficiency, as it could potentially obviate the need for a responsive pleading, and prevents Defendants
 17 from expending resources responding to claims that may not pass Rule 11 muster. Plaintiff and his
 18 counsel reserve all rights regarding any potential Motion that may be served and/or filed by the
 19 Defendants.

20 Respectfully submitted,

21 Dated: June 16, 2025

22 /s/ Robert Z. Demarco

23 David Z. Chesnoff, Esq.

24 Nevada Bar No. 2292

25 Richard A. Schonfeld, Esq.

26 Nevada Bar No. 6815

27 Robert Z. Demarco, Esq.

28 Nevada Bar No. 12359

CHESNOFF & SCHONFELD

Attorneys for Plaintiff

/s/ Margaret A. McLetchie

Margaret A. McLetchie (NV Bar No. 10931)

Email: maggie@nvlitigation.com

Leo S. Wolpert (NV Bar No. 12658)

Email: leo@nvlitigation.com

McLetchie Law

602 S. 10th St.

Las Vegas, NV 89101

Telephone: 702-728-5300

*Local Counsel for Defendant AJP Educational
 Foundation, Inc.*

/s/ Christopher M. Peterson

CHRISTOPHER M. PETERSON, ESQ.

Nevada Bar No.: 13932

JACOB T.S. VALENTINE, ESQ

Nevada Bar No.: 16324

AMERICAN CIVIL LIBERTIES UNION OF
NEVADA

4362 W. Cheyenne Ave.

North Las Vegas, NV 89032

Telephone: (702) 366-1226

Facsimile: (702) 366-1331

Emails: peterston@aclunv.org jsmith@aclunv.org

*Attorneys for Defendant Students for Justice in
Palestine - UNLV*

Christina A. Jump (*admitted pro hac vice*)

Email: cjump@clcma.org

Samira Elhosary (*admitted pro hac vice*)

Email: selhosary@clcma.org

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Richardson, Texas 75080

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*Counsel for Defendant AJP Educational
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Fund of America*

/s/ Andrew D. Smith

Elda M. Sidhu (NV Bar No. 7799)

Andrew D. Smith (NV Bar No. 8890)

UNIVERSITY OF NEVADA, LAS VEGAS

4505 S. Maryland Parkway, Box 451085

Las Vegas, Nevada 89154-1085

*Attorneys for University of Nevada, Las
Vegas*

ORDER

IT IS THEREFORE ORDERED that the Parties' Stipulation above is granted and Defendants' deadline to file Responses to Plaintiff's Second Amended Complaint shall be extended to July 25, 2025.

Dated 6-20-25.

UNITED STATES MAGISTRATE JUDGE